

technology, entertainment & media sector (TEMS)



2026 Stakeholders' Report

30th January 2026

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Introduction

This Stakeholders' Report reviews key legal, regulatory, and judicial developments in Nigeria's Technology, Entertainment, Media, and Sports (TEMS) sectors from December 2024 to December 2025. The period saw heightened

control of digital platforms, intellectual property, consumer protection, data privacy, and emerging technologies, reflecting efforts to balance innovation with compliance.

The Report highlights new directives from regulators, relevant legislation, and judicial decisions, while providing a 2026 outlook

to guide business operations and compliance in Nigeria's evolving digital and creative economy.

Executive Summary/High-impact Issues

This Stakeholders' Report reviews legislative, regulatory, and judicial developments in Nigeria's TEMS sector from December 2024 to December 2025, a period marked by heightened regulatory activity, stronger enforcement, and increased judicial involvement in technology and creative industries.

Although no new primary legislation was enacted, several Bills were proposed to modernise digital governance, strengthen enforcement, and address gaps in platform-based business models. Regulatory agencies issued directives on copyright, digital content, intellectual property, and sports governance, while courts clarified authority in areas such as data protection, advertising, competition, and platform oversight.

Looking to 2026, continued regulatory engagement and enforcement are expected, making proactive compliance, alignment with directives, and close monitoring of judicial trends critical for TEMS businesses.

Legal and Regulatory Developments

National Assembly Legislations

During the Report Period, there were no new laws passed that directly affected the TEMS ecosystem. The National Assembly, however, proposed the passage of the following Bills:-

1. Proceeds of Crime (Recovery and Management) Bill



2. The National Digital Economy and e-Governance Bill



3. The Central Gaming Bill



4. Fintech Regulatory Commission Bill



Summary of Proposed Bills

Proceeds of Crime (Recovery and Management) Bill

The Proceeds of Crime (Recovery and Management) Bill passed second reading as reported in the last quarter of 2025. The Bill is to amend the existing Proceeds of Crime (Recovery and Management) Act, 2022 and to better align with modern regulatory frameworks with best practices. One notable amendment is the designation of the Nigerian Copyright Commission (NCC) as a relevant organization, thereby expanding the list beyond traditional enforcement agencies.

Application: The Act will apply to all individuals, corporate entities, government agencies, financial institutions, and other organisations operating in Nigeria that engage in, facilitate, benefit from, or are otherwise involved in economic activities, financial transactions, or the creation, distribution, or management of assets that may constitute proceeds of crime, including those linked to intellectual property, digital content, or other regulated sectors.

Key Feature of the Proposed Bill for the Sector: The NCC received enhanced enforcement powers under the Proceeds of Crime Act. This empowerment allows the NCC to investigate, seize, and prosecute copyright infringements, including recovery of profits from illegal use of protected works. It represents a legal strengthening of IP enforcement mechanisms in the entertainment sector.

Implications for Entities Regulated by the NCC: The NCC can now take direct action against piracy and other copyright violations, improving protection for filmmakers, musicians, and content creators. This development complements the newly launched National IP Policy and is expected to improve enforcement against copyright infringers over the coming years.

The National Digital Economy and e-Governance Bill

During the fourth quarter of 2025, the National Assembly conducted public hearings on the National Digital Economy and e-Governance Bill, a proposed framework legislation aimed at consolidating Nigeria's legal approach to digital governance, public sector digitalisation, and technology-enabled service delivery.

Application: The Bill applies to individuals and public institutions regarding electronic transactions, communications, and records under Nigerian law. It also covers trust service providers, whether based in or outside Nigeria, for services offered or supported within the country. In addition, it applies to public institutions in relation to their processes, procedures, and systems, as well as to artificial intelligence and emerging technology agents as defined in the Bill.

Key Feature of the Proposed Bill for the Sector

- a. Modernises Electronic Transactions & Records: The Bill seeks to establish legal recognition for electronic contracts, records, timestamps, and digital signatures, supporting digital trade and legal certainty for online dealings.
- b. Digital Government Framework: The Bill mandates Information Communication Technology (ICT) units in public institutions, digital service delivery, and infrastructure for efficient government processes and transparency.
- c. Consumer Protection & Intermediary Liability Rules: The Bill clarifies liability for intermediaries and introduces consumer safeguards for electronic communications and digital services.
- d. Regulation & Ethical Governance of AI and Emerging Technologies: It introduces principles, regulatory functions, and sandbox or testbed frameworks for artificial intelligence and other emerging tech.

Implications for the TEMS Sector

- a. Stronger Legal Foundation for Digital Content & Services: Businesses will gain legal certainty for electronic contracts, digital records, and contracts, encouraging investment and innovation when the Bill is enacted.
- b. Clear Responsibilities for Digital Platforms and Intermediaries: Platforms hosting sport, music, film, and creative content must understand intermediary liability regimes and consumer protection provisions.
- c. Increased Regulatory Engagement on Use of Emerging Tech: AI in content creation, sport analytics, and entertainment applications will be subject to governance rules and sandboxes, prompting compliance and opportunity for innovation if the Bill is passed.

The Central Gaming Bill

In December 2025, the Senate passed the Central Gaming Bill, moving to repeal the National Lottery Act of 2005 and its 2017 Amendment. The Bill seeks to establish a federal framework for licensing and oversight of gaming and lottery activities, especially online and remote platforms. Critics have highlighted constitutional concerns, noting the Supreme Court's landmark decision in *A.G. Lagos State & Ors v. A.G. Federation & Ors (2024) LPELR-80160(SC)*, which held that gaming and lottery fall under state residual legislative powers. State regulators have equally condemned the Bill as federal overreach and their concerns have been reechoed by the President, Bola Tinubu in his rejection of the Bill.

Application: The provisions of the Central Gaming Bill was to apply to all gaming operators, whether online, remote, or physical, conducting lotteries, betting, and games of chance across Nigeria's federating units. Application was to also extend to digital platforms that facilitate remote or online gaming and transactions, as well as regulatory bodies, including existing agencies and any federal gaming authority established under the Bill.

Key Features of the Central Gaming Bill

- a. **Repeal of the National Lottery Act 2005 and its 2017 Amendment:** the Bill sought to remove the old statute and replace it with a modern, unified federal gaming law.
- b. **Federal Licensing & Oversight Framework:** it proposed a central regulatory regime for all forms of gaming and betting.
- c. **Nationwide Scope.** Its application was to extend to gaming regulation across all states and the Federal Capital Territory (FCT), including cross border digital operations.
- d. **Revenue & Compliance Provisions.** It aimed to standardise revenue collection, licensing fees, compliance standards, and regulatory enforcement under federal control.

Implications for the TEMS Sector

- a. **Constitutional & Regulatory Uncertainty:** The bill and ongoing reactions to it create uncertainty for operators on whether federal licensing can lawfully be enforced nationwide.
- b. **Preservation of State Autonomy:** With states asserting exclusive legislative competence and fiscal rights over gaming regulation and taxation, the current position favours decentralised, state level regulatory regimes. As such, TEMS stakeholders must engage with multiple state regulators rather than a single federal body.
- c. **Potential Litigation & Compliance Risks:** Continued legislative attempts to enact a centralised framework despite the Supreme Court decision may trigger constitutional challenges and enforcement disputes. Gaming, advertising, digital media and tech firms may face compliance risk until jurisdictional clarity is settled.
- d. **Focus on Collaborative Reforms:** The rejection of the Bill is likely to shift attention toward collaborative federal-state reforms, particularly for online gaming, rather than a centralised national framework or decentralised state oversight. Stakeholders need to contribute to dialogue on harmonised standards that respect federalism, and balances autonomy while supporting market growth.

Fintech Regulatory Commission Bill

In October 2025, the House of Representatives advanced the Nigerian Fintech Regulatory Commission Bill (HB.2389) to its second reading, representing a significant regulatory initiative toward unifying the country's fintech oversight framework.

Application: The Bill seeks to establish a Commission to consolidate the licensing, supervision, and regulation of all financial technology activities and harmonise overlapping mandates of different agencies into a single regulatory authority.

Key Features of the Nigerian Fintech Regulatory Commission Bill

- a. Establishment of a Dedicated Fintech Regulator: The Bill proposes creating the Nigerian Fintech Regulatory Commission (NFRC) as a statutory body responsible for licensing, supervising, and regulating fintech activities across Nigeria.
- b. Unified Regulatory Framework: It aims to consolidate oversight currently spread across multiple regulators into a single authority to streamline governance, reduce fragmentation, and provide clarity for operators.
- c. Consumer Protection and Innovation Promotion: The Bill includes functions to protect consumers against unfair practices, promote fair competition, and encourage innovation aligned with global best practices in fintech services.

Implications for the TEMS Sector

- a. Regulatory Clarity and Predictability: A unified regulator could reduce compliance complexity for tech and digital finance companies, offering clearer licensing and supervision standards compared to the current multi-agency environment.
- b. Potential Overlap and Bureaucracy: Without amendments to existing laws, the Bill may create overlapping regulatory obligations, increasing compliance costs and uncertainty for fintech-driven services.
- c. Impact on Consumer Trust & Adoption: Strengthened consumer protection provisions in the Bill may boost confidence in digital payment, lending, and platform services, benefiting media, entertainment, and sports platforms that integrate fintech solutions.
- d. Investment and Innovation Dynamics: A streamlined regulatory regime could attract more investment into fintech and adjacent tech sectors by reducing red tape, only if the NFRC's proposed mandate is implemented without conflicting with existing laws; otherwise, regulatory uncertainty might deter investors.

Subsidiary Regulations, Policies and Directives Made Pursuant to Existing Legislations

Nigerian Copyright Commission Directs Hospitality Businesses to Secure Public Performance Licences

Regulations/ Policies/ Directives Details

In September 2025, the Nigerian Copyright Commission (NCC) directed hotels, restaurants, bars, nightclubs, and other hospitality venues to obtain public performance licences for music, films, and other copyrighted works used commercially. It clarified that subscription licences from cable or broadcast services do not cover public performance rights. This directive, based on the Copyright Act 2022 and reinforced by the Collective Management Regulations 2025, aims to ensure clearer rights clearance and fairer royalty distribution for creators.

Implications for the TEMS Sector

This development marks a significant shift in enforcement for entertainment venues, establishing clearer legal obligations for compliance with intellectual property rights. It strengthens compensation for creators in music, film, and performance, while requiring stakeholders to work proactively with collecting societies and copyright holders to avoid infringement risks.

NCC Issues Advisory to DJs on Music Licensing

Regulations/ Policies/ Directives Details

On June 2, 2025, the Nigerian Copyright Commission (NCC) issued an Advisory warning that DJs publicly performing music without authorisation violate the Copyright Act 2022, risking fines of at least ₦1,000,000 or a minimum five-year prison term. To promote compliance, the Advisory highlighted a licensing framework between the Deejays Association of Nigeria (DJAN) and the Musical Copyright Society Nigeria (MCSN), allowing DJs to pay royalties through DJAN under agreed tariffs. The initiative aims to simplify licensing, ensure lawful music use, and secure fair compensation for rights holders.

Implications for the TEMS Sector

DJs and event platforms must adopt structured licensing to reduce copyright risks. The initiative streamlines compliance, promotes lawful music use, and ensures fair compensation for rights holders, making licensing integration essential for events and content platforms.

NCC Introduces the Collective Management Regulations, 2025 to Enhance Copyright Administration for Creators

Regulations/ Policies/ Directives Details

In mid-2025, the Nigerian Copyright Commission (NCC) issued the Collective Management Regulations under the Copyright Act 2022, replacing the previous framework for collective rights administration. The regulations strengthened accreditation, governance, and operational standards for Collective Management Organisations (CMOs), clarified their roles, expanded supervisory powers, and set higher benchmarks for royalty collection and distribution for music, film, and audiovisual rights owners.

Implications for the TEMS Sector

The Regulations create a clearer institutional pathway for creators to monetise public performance, broadcast and mechanical rights and formalise the operational landscape for collecting societies. Together with the public performance licence directive, the 2025 regulations signal a more structured enforcement environment for entertainment IP, requiring affected stakeholders to update their IP management practices.

Nigeria Launches its National Intellectual Property (IP) Policy

Regulations/ Policies/ Directives Details

In July 2025, Nigeria launched the National Intellectual Property (IP) Policy to strengthen protection across entertainment, media, and technology. The policy sets a framework for better enforcement, licensing, and public awareness, while aligning IP with innovation and creative economy strategies. It also highlights gaps such as the lack of protection for trade secrets, traditional knowledge, and traditional medicine, and calls for capacity building among regulators.

Implications for the TEMS Sector

For the creative industry, the policy strengthens protection and clarifies copyright, trademarks, and related rights. By aligning Nigeria with global IP standards, it safeguards creators, encourages investment, and supports innovation. In 2026, it is expected to shape licensing, content monetization, expand protection strategies, and enhance enforcement.

Criminalisation of Age Falsification in Sports

Regulations/ Policies/ Directives Details

In November 2025, the National Sports Commission (NSC), through the National Council on Sports, introduced a policy to criminalise age falsification in Nigerian sports. This regulatory initiative includes sanctions for athletes, officials, and administrators, with penalties ranging from disqualification to permanent bans for repeat offenders. The NSC Policy on Criminalisation of Age Falsification applies to all athletes, officials, administrators, and entities involved in Nigerian sports activities.

Implications for the TEMS Sector

The move strengthens integrity in Nigerian sports and establishes legal-like regulatory authority to enforce compliance, ensuring that age verification and reporting systems are strictly observed by teams and state delegations in 2026, which businesses can leverage to provide sports-related tech solutions.

NSC Establishes Election Petitions and Appeals Committees for Sports Federation Governance

Regulations/ Policies/ Directives Details

In June 2025, the Nigeria Sports Commission (NSC) established Election Petitions and Appeals Committees, comprising legal experts and administrators, to handle disputes from national sports federation elections. These bodies aim to promote transparency, fairness, and legal recourse in the selection of leadership within sports governing institutions.

Implications for the TEMS Sector

This decision formalises legal governance in Nigerian sports federations by creating adjudicatory bodies for petitions and appeals. Through these mechanisms, the NSC embeds rule-based dispute resolution into sports governance, opening opportunities for businesses to design compliant digital tools for sports administration.

NPFL Directs Disciplinary Measures Against Time-Wasting and Media Non- Compliance

Regulations/ Policies/ Directives Details

In October 2025, the Nigerian Premier Football League (NPFL) imposed ₦1 million fines on clubs whose ball boys engaged in time-wasting, reinforcing match integrity under league rules. Earlier, in May 2025, it announced sanctions for coaches who refused mandatory post-match media interviews, ensuring compliance with media obligations.

Implications for the TEMS Sector

These measures reflect an evolving sports governance regime that uses enforceable rules to regulate both on-field conduct and media engagement, strengthening professionalism and accountability, which are key considerations for stakeholders in sports media and technology.

Judicial Decisions That Could Affect Your Company's Business or Operations:

There were some key judicial decisions reached in 2025 that could affect business in TEMS in 2026 should they not be overruled.

Federal High Court Records Settlement Between Meta and NDPC Over Data Protection Enforcement

In November 2025, the Federal High Court recorded an out-of-court settlement between Meta Platforms Inc. and the Nigeria Data Protection Commission (NDPC) over a US\$32.8 million fine imposed earlier that year for alleged breaches of the Data Protection Act involving behavioral advertising and cross-border data transfers. Though undisclosed, the settlement terms were adopted as a consent judgment. The case illustrates Nigeria's growing enforcement approach, combining heavy sanctions with negotiation, while underscoring rising legal and financial risks for technology firms. However, a December 2025 application to the Court by the Data Privacy Lawyers Association of Nigeria (DPLAN) to halt the settlement may hinder future negotiated resolutions and shift focus to fines and litigation.

Judicial Conflict Over Advertising Regulatory Council of Nigeria (ARCON) Powers

In November 2025, the Federal High Court issued conflicting rulings on the constitutional scope of the Advertising Regulatory Council of Nigeria Act 2022 (ARCON Act). The Lagos Division, in Massilia Motors Ltd v. ARCON, held that ARCON's powers over outdoor advertising infringed on Local Government authority and declared those provisions void. In contrast, the Lokoja Division, in Godec Power Nigeria Ltd v. Attorney General & ARCON, upheld the Act's validity, affirming ARCON's authority to regulate advertising across media. These contradictory judgments create significant legal uncertainty over advertising regulation in Nigeria and are expected to prompt appellate review in 2026, with major implications for federal and local regulatory powers.

Federal High Court Affirms FCCPC's Power to Investigate MultiChoice Nigeria

In 2025, MultiChoice Nigeria faced sustained legal challenges over subscription price increases for DSTv and GOtv. The FCCPC alleged breaches of competition law, and the Federal High Court dismissed MultiChoice's attempt to block investigations, calling it an abuse of process. Separately, the NDPC fined the company ₦766,242,500 for unlawful data processing and cross-border transfers. Together, these actions highlight growing regulatory and judicial scrutiny of dominant media providers in Nigeria.

Federal High Court Declares ARCON Has Power to Regulate Advertising on Social Media and Other Platforms

In April 2025, the Federal High Court in Lagos upheld the Advertising Regulatory Council of Nigeria's (ARCON) authority to regulate advertising across all media, including social and digital platforms. The Court ruled that ARCON's jurisdiction is defined by the act of advertising itself, confirming oversight of content on platforms like Instagram, Facebook, X, and TikTok. It clarified that while ARCON may issue infractions and directives, sanctions must come from the Advertising Offences Tribunal, and all advertising content must be vetted and approved before publication.

This judgment reinforces ARCON's role as Nigeria's central advertising regulator, strengthening certainty in digital advertising and highlighting the need for brands, media companies, influencers, and platform advertisers to embed ARCON compliance into their strategies.

Outlook For Businesses In 2026

The regulatory and judicial developments observed during the 2025 review period indicate that Nigeria's TEMS sector has entered a more assertive phase of regulatory engagement. Regulators are increasingly confident in exercising statutory powers, extending oversight to digital platforms, and enforcing compliance

across technology-enabled business models. At the same time, the judiciary has assumed a critical role in defining the limits and legitimacy of regulatory authority, particularly where innovation intersects with constitutional and administrative law.

In 2026, businesses operating within the TEMS sectors should expect continued regulatory scrutiny, with enforcement rather than policy experimentation remaining the dominant feature of the regulatory landscape. Regulatory agencies are likely to prioritise supervision of digital platforms, content dissemination models, and data-driven services, reflecting growing concerns around consumer protection, competition, data privacy, and market dominance. This trajectory suggests that regulatory tolerance for informal compliance practices will continue to narrow.

Competition and consumer protection enforcement are also expected to intensify. The actions of the FCCPC and NDPC in 2025, supported by judicial affirmation, signal a willingness to pursue investigations and sanctions against dominant or non-compliant

operators. For businesses in the media, entertainment, and sports sectors that rely heavily on subscriptions, advertising, data analytics, platform monetisation, pricing strategies, user data handling, and market conduct will attract closer regulatory attention.

Content regulation will remain a focal point in 2026. Decisions affirming ARCON's authority over digital and social media advertising, alongside strengthened copyright enforcement by the Nigerian Copyright Commission, indicate that online content will increasingly be regulated in the same manner as traditional media. Brands, creators, influencers, and platform operators will need to integrate content approval, licensing, and rights-clearance processes into their operational frameworks to manage regulatory risk.

Judicial developments will continue to shape regulatory outcomes in 2026, particularly in areas where federal and state competencies overlap. Conflicting court decisions on advertising and gaming regulation underscore the likelihood of appellate intervention and evolving jurisprudence. Businesses should therefore closely monitor litigation trends, as court rulings will play a decisive role in clarifying regulatory boundaries and compliance expectations.

Against this backdrop, proactive and forward-looking compliance strategies will be essential. TEMS stakeholders should prioritise early regulatory engagement, internal compliance audits, and alignment of business models with existing and proposed regulatory frameworks. Organisations that anticipate regulatory expectations and adapt early are more likely to mitigate enforcement risks and capitalise on opportunities arising from Nigeria's expanding digital and creative economy.

Looking ahead to 2026, stakeholders should anticipate:

- Sustained regulatory engagement across the TEMS sectors.
- Increased regulatory focus on digital platforms and platform governance.
- Heightened scrutiny of competition and market conduct.
- Strong emphasis on data governance and privacy compliance.
- Closer oversight of content standards in media and entertainment.
- Growing need for forward-looking and proactive compliance strategies.
- Greater importance of regulatory alignment in business operations.
- Increased reliance on judicial trends in shaping regulatory enforcement.

Conclusion

We trust that this Report is invaluable to your operations, particularly in relation to regulatory compliance in Nigeria during the Report period. Should you require further

clarification on any new legislation, regulation, guideline, or directive, please do not hesitate to reach us at contact@strenandblan.com.

About Stren&Blan Partners

Stren and Blan Partners is a world-class ingenious law firm with a beautiful blend of the brightest minds and well-rounded individuals championed with sole responsibilities of providing solutions to business problems and equally finding answers to the questions of our clients. We are a team always guided by our professional ethics. Also, honesty and transparency have been our watchwords in practice.

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